



DEVELOPMENT DEPARTMENT

101 N. DETROIT ST. XENIA, OH 45385 (937) 372-6380 (937) 372-8151 (FAX) WWW.CI.XENIA.OH.US
 December 18, 2014

Environmental Management Support, Inc.
 Attn: Mrs. Edie Findeis Cromwell
 8601 Georgia Avenue, Suite 500
 Silver Spring, MD 20910
 Phone: (301) 589-5318

United States Environmental Protection
 Agency
 EPA Region 5
 Attn: Mr. Brad Bradley
 77 West Jackson Boulevard
 Mail Code SM-7J
 Chicago, IL 60604-3507
 Phone: (312) 866-4742

Re: City of Xenia – U.S. EPA Community-Wide Brownfield Assessment (Hazardous Substances and Petroleum) Grant Application

Dear Mrs. Cromwell and Mr. Bradley:

The City of Xenia is pleased to submit this application for grant funding from the U.S. EPA Brownfield Assessment Program. The requested \$400,000 in funding is for community-wide assessment of both petroleum and hazardous substances in the City of Xenia.

The following information is provided per the application guidelines:

a. Applicant Identification:	City of Xenia, Xenia City Hall, 101 N. Detroit Street, Xenia, OH 45835
b. Applicant's DUNS No(s):	092824150
c. Funding Requested:	i) Grant Type: Assessment ii) Funds Requested: \$400,000 total; \$200,000 for petroleum and \$200,000 for hazardous substances iii) Contamination: \$400,000 total; \$200,000 for petroleum and \$200,000 for hazardous substances iv) Community-Wide
d. Location:	Xenia, Greene County, Ohio
e. Property Name/Address:	Not applicable (community-wide assessment)
f. Project Director:	Steve Brodsky, Development Director Xenia City Hall, 101 N. Detroit Street, Xenia, OH 45835 Phone: 937-372-7943 Fax: 937-372-8151 Email: sbrodsky@ci.xenia.oh.us
Chief Executive:	Brent Merriman, City Manager Xenia City Hall, 1st Floor, 101 N. Detroit Street, Xenia, OH 45385 Phone: 937-376-7231 Fax: 937-374-1818 Email: bmerriman@ci.xenia.oh.us
g. Date Submitted:	December 18, 2014
h. Project Period:	10/1/2015 through 9/30/2018 (not to exceed 3 years)
i. Population:	i) 25,879 according to 2013 US Census estimates

ii) Not Applicable

j. Special Considerations:

See Attachment x of the Narrative.

The City of Xenia is located in southwestern Ohio and is the Greene County seat. Xenia exemplifies the debilitating economic effects of shifting trends in manufacturing, demographics, and the forces of nature. The loss of a former rail hub, multiple core industrial businesses clustered around it, and an F5 tornado have ravaged the City of Xenia's economy, neighborhoods and finances. Furthermore, dramatic reductions in State-level funding have forced the City to cut staff and/or reduce services.

Xenia has coped with these losses and taken innovative steps to try to revitalize the local economy and neighborhoods. For instance, conversion of the former rail hub to a major bike trail hub offers promise of sustainable, mixed-use redevelopment oriented toward bike trails, greenspace and trail-related tourism. However, this promise is hampered by the presence of numerous vacant, dilapidated brownfield properties which lower property values, attract crime, present health concerns for surrounding neighborhoods, threaten the health of a tributary of a State and National Scenic River, prevent restoration of lost jobs, and deter private investment.

Although the City has secured funding from the State of Ohio's Brownfield Action Plan grant and Ohio EPA to initiate Phase I and Phase II assessments of one critical brownfield property, the funding will likely cover less than half the costs of this Phase II assessment. Furthermore, the City has identified a total of 17 other brownfield properties surrounding the former rail hub for which no funding has been secured. Due to its economic and financial challenges, the City lacks the ability to tackle these problems on its own. The USEPA Assessment Grants will be critical in helping Xenia remove threats to its environment and health, revitalize distressed neighborhoods, and provide new employment opportunities for disadvantaged residents.

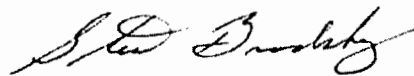
The City has a proven track record of leveraging partnerships and administering grants, including administration of previous Clean Ohio brownfield revitalization grants. We are eager to apply these capabilities toward unlocking Xenia's potential and restoring hope to the Xenia community.

Thank you for your support of our application. Please do not hesitate to call us at (937)372-7943 if we can provide any additional information or clarification on any issue.

Sincerely,



Ryan Duke, Assistant City Manager



Steve Brodsky, Development Director

Attachment: Narrative and Special Considerations Checklist

RANKING CRITERIA**1. COMMUNITY NEED****a. Targeted Community and Brownfields***i. Targeted Community Description*

The City of Xenia is located in southwestern Ohio and is the Greene County seat. Xenia exemplifies the debilitating economic effects of shifting trends in manufacturing, demographics, and the forces of nature. Founded in 1803, Xenia was comprised of a few dwellings and a tavern. By 1865 the City had become a railroad "HUB" through which passed much of the commercial and passenger traffic of western Ohio.

At its peak, the City included lumber mills, a manufactured gas plant, oil storage and distribution, coal storage, warehousing, rope and cord manufacturing, and heavy industrial manufacturing. However, by the 1970s, the railroads abandoned Xenia. Coincidentally, population declined for the next 30 years (1970 to 2000). The old railroad HUB is now the center of five regional bicycle trails which extend throughout southwestern Ohio, built by Xenia and partner agencies on the former railroad rights-of-way.

Brownfields are the legacy of this abandonment. The City must expand their existing redevelopment program to address this legacy. In 2012 the City was awarded 1 of 6 statewide grants to develop a Brownfield Action Plan (BAP). The BAP has since been incorporated into the City's comprehensive plan (X-Plan). The BAP focuses on the 118-acre **HUB District** which is the major target of this application for brownfield assessment funding. The BAP identified 18 potential brownfield sites in the **HUB District** which are vacant or underutilized.

The presence of the bike trail HUB and proximity to downtown Xenia create the potential for revitalization. However, the **HUB District** remains distressed because redevelopment efforts are hampered by perceived and potential contaminants. These include oil storage facilities, a manufactured gas plant, an electrical substation, and assorted manufacturing, service and warehousing operations. Suspected materials include petroleum and petroleum based solvents and paints, asbestos containing materials, volatile and semi-volatile organic compounds, and polychlorinated biphenyls.

The City of Xenia does not have the available funding to begin redevelopment efforts due to a lack of tax base and declining population. Adverse public health conditions (see Section 4), criminal activity around vacant buildings and general physical conditions within the **HUB District** also hamper redevelopment efforts. Addressing the economic development issues and the brownfield issues in a coordinated manner will lead to greater investment in the neighborhoods, allow for greater job growth, and improve the City's financial position through tax revenue base. For the past 30 years Xenia has spent a great deal of its capital resources recovering from an F5 tornado which devastated the City in 1974. Physically Xenia has recovered, but the economic scars of this natural disaster linger.

ii. Demographic Information

The following table presents demographic comparisons for the United States, State of Ohio, City of Xenia, and specific census tracts within the City which make up the **HUB District**:

	Census Tract 2403.02	Census Tract 2406	Census Tract 2407	City of Xenia	Greene County	State of Ohio	National
Population ¹ :	3,823	5,528	2,752	25,719	161,573	11,536,504	308,745,538
Unemployment ² :	N/A	N/A	N/A	5.8 %	5.1 %	5.7 %	5.9 %
Percent Minority ¹ :	15.0 %	60.6 %	8.4 %	18.0 %	13.6 %	17.3 %	26.7 %
Block Group	2403.02-1	2406-5	2407-2	City	County	---	---

¹ Data is from the 2010 U.S. Census data and is available at <http://www.census.gov>.

² Data is from the Bureau of Labor Statistics (September 2014) and is available at <http://www.bls.gov>.

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	Census Tract 2403.02	Census Tract 2406	Census Tract 2407	City of Xenia	Greene County	State of Ohio	National
Poverty Rate ³ :	21.3 %	43.2 %	20.8 %	19.2%	11.4%	14.2%	13.8 %
Per Capita Income ³ :	\$17,376	\$11,109	\$20,040	\$19,665	\$28,328	\$25,113	\$27,334
Avg. Housing Age ⁴	102 yrs	103 yrs	89 yrs	52 yrs	45 yrs	---	---
Owner Occupancy ¹	31.9%	28.0%	55.6%	61.6%	67.7%	---	---
Housing vacancy ¹	10.7%	14.5%	9.4%	8.8%	8.0%	---	---
Tax Delinquency ⁴	8.5%	7.1%	7.6%	5.1%	3.1%	---	---

The above data was obtained from various resources through the U.S. Census Bureau, the Bureau of Labor Statistics, and the Ohio Department of Job and Family Services^{1 to 4}. Other demographic information (health) is discussed in Section 1.c.ii and 4.a. Between the years 2006 to 2010, 19.2% of Xenia's residents were living below the poverty level which was 35% higher than the average for Ohio. As expected, median household income was 16% below the state average and per capita income was 22% lower. In 2013, Xenia was listed as a Priority Investment Area by the State of Ohio. Economic development and community reinvestment is much needed and the revitalization of these 18 suspect properties is one key to that recovery.

The targeted **HUB District** is in the core of the city and comprises three census tracts. As previously described, it includes some of the oldest industrial properties in the city. The housing stock has a median year of construction of 1917 and vacancy rates range up to 21% in one census tract. In this targeted area, 29% of the nearly 2,000 residents live below the poverty level and unemployment is 15.5%, over twice the national average. The three census tracts included in this target district contain almost 90% of the city's minority population. The economic depression of this area fostered by the general blight and the reluctance of investors to take on development of suspect properties, coupled with the possible exposure to the potential contaminants from more than a century of industrial activity, raises a huge issue of environmental justice which the city continues to address.

iii. Brownfields

As part of the BAP the City, Brownfield Action Committee (BAC), and Ohio Development Services Agency first reviewed the City as a whole. Although the BAC identified four distinct districts, they identified the **HUB District** with the greatest potential for redevelopment. The regional bikeway trails that converge in this district are a unique asset because of their tourism potential for Xenia and the recreational, transportation and health benefits to local residents and businesses. Brownfield redevelopment will remove eyesores and unlock opportunities for new businesses that cater to bike traffic and improve the residential attractiveness of neighborhoods that have direct trail access, but are marred by vacant and abandoned properties. Additional assets include proximity to downtown businesses, the Xenia Station visitor's center, natural amenities with planned greenways, the Athletes in Action headquarters, the Waterstreet and East Second Street Historic Districts and the Downtown Xenia Historic District. The BAC identified 18 properties which fit the core concerns of the BAC: underutilized commercial and industrial properties; vacant industrial properties negatively impacting the surrounding area; properties requiring extensive remediation; lack of physical connections to the surrounding community; lack of employment opportunities (high neighborhood unemployment rate); and high rates of health problems.

The City does not have the funds to focus on more than one district and even then has very limited funds to perform the necessary assessments to begin redevelopment efforts. As indicated the HUB District has two

³ Data is from the 2010 American FactFinder database and is per capita income.

⁴ Derived from Greene County Auditor parcel-level data. Tax delinquency is a percentage of all parcels in the block group

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key components: (1) multiple brownfields; and (2) the potential for the greatest redevelopment efforts. The brownfields identified by the BAC include blighted areas with numerous abandoned service repair and fuel storage facilities (petroleum), a former manufactured gas plant (petroleum, metals, petroleum-based solvents, PCBs), dry cleaners (VOCs), small metal finishing/machine shops (VOCs, SVOCs, metals), and assorted former manufacturing facilities (asbestos, petroleum, metals, arsenic, creosote) that supported the now defunct industrial manufacturing complexes in the City.

iv. Cumulative Environmental Issues

Within or adjacent to the HUB District, two Clean Ohio brownfield redevelopment projects have been completed. Environmental issues at both sites included asbestos containing materials, petroleum products, VOCs, and SVOCs. These projects have removed two major sources of environmental impairment. In reviewing aerial photographs, other cumulative environmental concerns were noted including major transportation routes (US Routes 35 and 42), closed industrial buildings, vacant and/or underutilized commercial complexes, abandoned service and repair stations, active and closed dry cleaners, and small machining shop scattered throughout the City.

b. Impacts on Targeted Community

Specific health and welfare benefits associated with the three priority areas are summarized below:

Site	Potential Health and Welfare Benefits
<i>Abandoned Gas Stations</i>	Site histories will be determined. Presence of USTs will be determined. Impacted spoil and groundwater will be identified so that remedial measures may be determined to limit vapor intrusion and inhalation concerns for residents.
<i>Former Dry Cleaners</i>	Site histories will be determined. Impacted spoil and groundwater will be identified so that remedial measures may be determined to limit vapor intrusion and inhalation concerns for low-income residents.
<i>Former Automotive Garage & Repair Shops</i>	Hazardous building materials (ACM & LBP) will be identified so that remedial measures can be determined. Waste/junk materials will be removed and recycled as appropriate. Impacted soil and groundwater will be identified so that remedial measures may be determined to limit the concerns for low-income residents.
<i>Former Machine Shops</i>	Hazardous building materials (ACM & LBP) will be identified so that remedial measures can be determined. Extent of impacted soil and groundwater will be identified so that remedial measures may be determined to address direct contact, inhalation, and ingestion concerns for low-income residents.
<i>Former Manufacturing Facilities</i>	Hazardous building materials (ACM & LBP) will be identified so that remedial measures can be determined. Waste materials will be removed and recycled as appropriate. Impacted soil and groundwater will be identified so that remedial measures may be determined to limit the concerns for adjoining residents.
<i>Manufactured Gas Plant</i>	Site history will be determined. Impacted spoil and groundwater will be identified so that remedial measures may be determined to limit vapor intrusion and inhalation concerns for low-income residents. The City has applied for a Targeted Brownfield Assessment to begin to investigate this property.

Cleanup and redevelopment of these sites will greatly reduce environmental threats to residents living, working, shopping, learning, and playing in the HUB District. Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents. These redevelopment outcomes include promoting the regional bikeway system for more transportation choice, creating a walkable community in

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the **HUB District**, providing more green space in this neighborhood, and allowing more leveraging of resources for redevelopment.

Assessment Grant operating procedures will ensure that the City is protected from contaminants during assessment work. The public will be notified that the assessment work will be happening. A Sampling and Analysis Plan (SAP) will be completed for each site where intrusive sampling will occur, and access to the site will be controlled during assessment operations. As specified in the SAP, when subsurface samples are collected or hazardous building materials are disturbed, the release of particulates and vapors will be monitored and controlled. Decontamination water and purge water generated during groundwater sampling activities will be containerized on-site and appropriately disposed. The assessment data generated will be used to help the City and/or a developer determine how to protect the community during redevelopment activities.

The redevelopment of those brownfields deemed by the City to be priority areas, in conjunction with planned stormwater and watershed management practices (Section 4.c) will also limit uncontrolled nonpoint pollution sources (i.e., agriculture) and illicit discharges and improve water and sediment quality in Shawnee Creek, a tributary to the Little Miami River, a State and National Scenic River. This will reduce contaminants in these waterways and watershed, improving aquatic life.

Financial Need

i. Economic Conditions

Xenia's economic success has long been tied to a manufacturing base that has slowly crumbled, triggering a loss of employment opportunities and money available for investment in the community. The City is facing an ever-tightening budget as property values decline, state-level revenue sources plummet, and local income tax revenues stagnate. The City requires additional funding to continue assessing their brownfields, which are contributing to the ongoing deterioration of neighborhoods, commercial zones, and industrial districts. Redevelopment of these sites will spur economic growth, which will provide impoverished residents with much needed employment opportunities and increase the property and income tax base throughout the City and in the **HUB District**.

As previously noted, in 1974 Xenia was hit by an F5 tornado, the largest on record in Ohio⁵. Thirty-two people were killed, approximately half of the buildings in the City were damaged and 300 homes totally destroyed. Nine churches were destroyed, as were seven of the City's twelve schools. After 40 years, the City has been physically restored, but the economic effects linger through lost businesses and employment which has not recovered. Disaster recovery has taken a high priority in City funding and local resources for redevelopment have been stretched thin.

Between the years 2006 and 2010, 19.2% of Xenia's residents were living below the poverty level which was 35% higher than the state average. As expected, median household income was 16% below the state average and per capita income was 22% lower. In 2013, Xenia was listed as a Priority Investment Area by the State of Ohio. Economic development and community reinvestment is much needed and the revitalization of the **HUB District** is one key to that recovery.

The targeted **HUB District** is in the core of the city and comprises three census tracts. As previously described, it includes some of the oldest industrial properties in the city. The housing stock has a median year of construction of 1917 and vacancy rates range up to 21% in one census tract. In this targeted area, 29% of the nearly 2,000 residents live below the poverty level and unemployment is three times that of the City overall. The three census tracts included in this target district contain almost 90% of the city's minority population. The economic depression of this area fostered by the general blight and the reluctance of

⁵ http://www2.ohiohistory.org/etcetera/exhibits/swio/pages/content/1974_tornado.htm

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investors to take on development of suspect properties, coupled with the possible exposure to the potential contaminants from more than a century of industrial activity raises an environmental justice issue.

The City's primary financial concern is the lack of quality employment opportunities, which is disproportionately impacting the residents of the **HUB District** as well as other neighborhoods in the City. Unemployment has gradually improved, but economic statistics illustrate the difficulties for the City to replace lost good-paying manufacturing jobs. In the past five years alone, over 250 manufacturing jobs were lost as multiple manufacturers dramatically reduced or closed operations in the City⁶. Most recently, the K-Mart store in Xenia closed its doors laying off 57 employees. The second component of the City's financial need is the decrease in available revenue. A contributing factor has been the restructuring of Ohio's state budget which has eliminated a majority of state funding to municipalities through cuts in the Local Government Assistance Fund. State funding has been reduced by 58% since 2008. Local property taxes shrank 14% in the last five years, and income taxes have stagnated⁷.

The BAP estimated that the costs of remediation for the 18 properties, assuming moderate environmental impairment, would range from \$3,025,000 to \$9,420,000⁸. These amounts are overwhelming and the Assessment Grant funds will help to mitigate this local financial burden and help prioritize investments.

ii. Economic Effects of Brownfields

The effect of brownfields on the **HUB District** has resulted in adverse economic impacts to the residents of the district and adjoining neighborhoods. The economic effects include a lack of employment opportunities, poor health conditions, and lack of local commercial venues, particularly nutritional (*lack of grocery stores – food deserts*). Between the years of 2006 and 2010, 19.2% of Xenia's residents were living below the poverty level and median household income was 16% below the state average and per capita income was 22% lower. The perception of environmental contamination in the neighborhood has discouraged redevelopment efforts and contributed to disinvestment in this community.

The City residents, particularly those in the **HUB District**, are facing increasing economic stresses, and their need for assistance is growing. Economic statistics from the U.S. Bureau of Economic Analysis (USBEA) illustrate the difficulties for the residents, manufacturing economy, and business community. The USBEA reported a substantial decrease in manufacturing employment not only in Greene County but specifically in Xenia. This started before the national economic crisis. These brownfields, located near or in residential neighborhoods, schools, and/or parks, negatively impact sensitive populations by potentially exposing them to numerous contaminants via direct contact, particulate ingestion, airborne particulate inhalation, and vapor intrusion pathways creating health issues resulting in an undue economic impact on the disadvantaged residents.

The USEPA AirData County Emissions Report for 2013 indicates that the vehicle traffic on U.S. Routes 35 and 42 have historically contributed millions of pounds of air pollutants. Now that U.S. Route 35 has been re-routed to the south of Xenia and U.S. Route 42 is no longer a major thoroughfare, emissions may be lower but residents living near these routes have already been exposed to numerous airborne contaminants and continue to be exposed to residual contaminants via airborne particulate inhalation, particulate ingestion, and vapor intrusion pathways. Compounding the effect of environmental pollutants are additional health concerns that are more prevalent in poor communities, hence a greater economic drain.

⁶ Information provided by the City's Economic Development Director, 2013

⁷ Email communications from the City's Planner, 2014.

⁸ Brownfield Action Plan, City of Xenia, 2013

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The housing stock in the **HUB District** has a median year of construction of 1917 and vacancy rates range up to 21% in one census tract. The economic depression of this area fostered by the general blight and neighborhood condition has caused a reluctance by investors to take on redevelopment of suspect properties. The general condition of the area, coupled with the possible exposure to the potential contaminants from more than a century of industrial activity, makes this a priority area for City investment to address issues of environmental justice for the residents.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**a. Project Description**

Xenia's X-Plan has been updated to reflect the City's transition to a more targeted approach to planning and redevelopment activities. As part of this X-Plan update, the City partnered with the ODSA in 2013 to develop an action plan for brownfields. The City will use the BAP and the X-Plan as road maps for a targeted approach to smart growth and creation of a truly livable community. These citizen-driven plans (the BAP and the X-Plan) identified 18 primary properties within the **HUB District** for prioritization and redevelopment efforts. Although other areas were identified in the plans, the City has decided to give priority to the **HUB District**. The **HUB District** plan promotes the development of an outdoor recreation oriented district focusing on the regional trail system which converges in the district at the Xenia Station Visitor Center. The area will also contain "gateway" features highlighting the open space and recreational nature of the City. Mixed use commercial development catering to the bicycling and hiking residents and visitors is planned for the brownfield development. The City will first focus on 4 of the 18 areas, the Sycamore/Leaman area, which contains a number of brownfields and a potential manufactured gas plant, the Columbus/Collier area, the Washington/Hill area, and the Cincinnati/Grove area. These four areas were chosen because of the lack of true "shovel ready" sites and/or location of sites in relation to the bike trails which converge at a "HUB" near the restored railroad station depot (the Xenia Station). The grant funds will support a key step in reaching these goals, which is the assessment of brownfields in the 211-acre district and the Little Miami River watershed, which are negatively impacting the health and welfare of sensitive populations, the environment, and the City's economy.

Xenia has already begun a major redevelopment project in the Cincinnati/Grove area, called the former Hooven & Allison Cordage Company using funds from the Clean Ohio Fund program. The remediation of this property is complete and the City is awaiting a CNS. In addition to the \$2,258,000 of Clean Ohio funds expended, the City has invested approximately \$1,500,500 of local funds into this assessment and remediation project. Athletics in Action, headquartered in Xenia, has also completed a major redevelopment project on their campus, just south of the Cincinnati/Grove area, using funds from the Clean Ohio Fund program. In addition Xenia has received Targeted Brownfield Assessment funds from Ohio EPA to begin investigating a former manufactured (coal) gas plant and an adjacent former grocery warehouse. The intent of this coordinated funding approach is to create a transformative impact on areas in which other funds (e.g., CDBG funds) and other City resources are already concentrated. This approach will focus on assessing the unique needs of each of the 18 brownfield areas, building capacity and stability within the community, and fostering neighborhood involvement and support.

As the USEPA Assessment grant project progresses, Xenia will also assess other priority sites and integrate high-risk and developable sites identified by community members and community organizations (Section 3) into the project and utilize appropriate grant funds to assess these sites.

The Brownfields Advisory Committee (BAC) provides guidance and direction for the program, while also providing an opportunity to market brownfields, educate the community, and foster public participation. The City will reactivate the BAC which will meet at least quarterly and discuss program progress. The City's Development Department will act as lead organization and will be responsible for day-to-day grant

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operations including: updating and maintaining the brownfields inventory; distributing information about the project to the community, seeking input and collaboration from the community; selecting sites for assessment; working with property owners; seeking out and working with potential end users; and tracking project progress. Xenia will also be responsible for procuring all contractual services, submittal of required reports to the EPA, and managing the brownfields information. The City will utilize the BAP as its Work Plan which has received input from ODSA and the community. After submittal of the BAP with additional focus on the **HUB District**, Xenia will retain a qualified environmental consultant in compliance with applicable federal procurement regulations. The qualified environmental consultant will assist with grant management operations, perform the assessment work, and assist with required reporting. Additional details on the project team's programmatic capability are provided in Section 5.

After a site is deemed eligible by the USEPA, the community will be notified and the site will be assessed through performance of a Phase I Property Assessment (PIPA) and/or a Phase II Property Assessment (PIIPA). PIPA will be conducted according to the requirements of All Appropriate Inquiry (ASTM Standard E1527-13) and, where appropriate, the Ohio Voluntary Action Program (VAP). The environmental consultant will design a PIIPA conforming to the ASTM Standard E1903-11 and, where appropriate, the Ohio VAP to investigate areas of potential environmental impact. Assessment procedures will be instituted to ensure that the community is protected from contaminants during assessment work (Section 4.a). Upon receipt of assessment results, the environmental consultant will work with the City, potential developer, and community partners to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health of residents and the environment. After completion of initial assessment activities, additional safe use or remedial investigations may be needed to further define the extent of contamination and design environmental response actions for cleanup and safe future use of the site. Contaminated sites may be entered into Ohio's Brownfields Program. The results of assessments will be disseminated to the community through public meetings and notification of community organizations (Section 3). If health threats are identified, the Ohio EPA and Greene County Combined Health District will be notified. Xenia will also pursue enforcement action against site owners violating City property maintenance ordinances. If needed, the City will seek additional funding from local and state sources and/or the USEPA for assessment activities and subsequent environmental response activities.

Assessment Grant funds will allow Xenia to begin addressing the brownfields that limit redevelopment options, negatively impact sensitive populations and the environment, and tarnish its image. By completing this project, Xenia will expand its framework for an effective brownfields program, provide incentives for businesses and residents to invest in the community, and achieve the X-Plan's redevelopment objectives.

b. Task Description and Budget Table

The City is requesting a grant in the amount of \$200,000 for assessment of hazardous substances and \$200,000 for assessment of petroleum substances. All budget tasks under the contractual category will be performed by a qualified environmental consultant in accordance with the Ohio EPA and U.S. EPA guidelines.

Budget Categories	Task 1: Program Costs	Task 2: Community Outreach	Task 3: Site Inventory	Task 4: Site Assessments	Task 5: Cleanup Planning	Total Grant Budget
Hazardous Substances Assessment Budget						
Personnel						
Travel	\$1,500	\$100				\$1,600
Supplies		\$750				\$750
Contractual		\$2,500	\$2,500	\$184,650	\$8,000	\$197,650
Subtotal	\$1,500	\$3,350	\$2,500	\$184,650	\$8,000	\$200,000

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Budget Categories	Task 1: Program Costs	Task 2: Community Outreach	Task 3: Site Inventory	Task 4: Site Assessments	Task 5: Cleanup Planning	Total Grant Budget
Petroleum Assessment Budget						
Personnel						
Travel	\$1,500	\$100				\$1,600
Supplies		\$750				\$750
Contractual		\$2,500	\$2,500	\$184,650	\$8,000	\$197,650
Subtotal	\$1,500	\$3,350	\$2,500	\$184,650	\$8,000	\$200,000
Grant Total	\$3,000	\$6,700	\$5,000	\$369,300	\$16,000	\$400,000

No grant funds will be used for administrative tasks. Staff salaries, equipment, and most supplies will be paid for with existing funds from their respective coalition members, as in-kind services. Task details are presented below.

Task 1: Program Costs – The City will provide in-kind staff resources associated with the majority of the programmatic costs, including conducting the community outreach program, documenting the site selection process, coordinating and conducting operational meetings, and other activities associated with grant inventory and assessment functions. The 300 hours of committed in-kind services are estimated to be valued at \$12,000. The Assessment Grant proposal budget includes projected programmatic costs of \$1,000 for travel to one Ohio Brownfields Conference and \$2,000 for travel and expenses to one US EPA National Brownfields Conference. The City will not use Assessment Grant funds to support costs associated with administrative functions such as salaries and benefits.

Task 2: Community Involvement – The City anticipates community outreach program costs of approximately \$6,700. These costs, based on experience with other brownfield projects in Xenia as well as the community outreach effort already conducted as part of the City's BAP, will include contractual costs of \$5,000 for coordinating and conducting community involvement outreach programs and meetings and travel to community outreach events, \$200 for mileage to and from meetings and events, and \$1,500 for the costs of preparing, printing, and mailing project and site information and marketing pamphlets, documents, etc. The City will also provide in-kind additional staff labor, estimated to be \$6,000 in value, needed to conduct community outreach meetings, draft press releases, update the City's website as new information is generated, and other activities to complete the community outreach programs.

Task 3: Site Inventory – As the City has already completed an initial site inventory (18 sites) as part of the BAP grant, the City anticipates site inventory contractual costs of \$5,000 including the initial input into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database and completion of property approval forms. Site evaluation criteria were developed as part of the City's BAP and were used to rank the sites for selection of environmental due diligence. The site inventory has been presented to the ODSA, Ohio Environmental Protection Agency (Ohio EPA), City staff including the City Manager, and the HUB District community through public access. Community outreach for the site inventory has already been conducted as part of the City's BAP. Only new site information and further definition of a site's information is currently planned for this task.

The City and CBOs (see Section 2.b.iii) will provide in-kind labor, estimated to be valued at \$5,000. Site Assessments will begin upon approval of the final site inventory. This will help the City reach the livability goals for the HUB District sooner rather than later.

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Task 4: Site Assessments – Site assessments will include the following activities: Phase I Environmental Site Assessment (PIESA); preparation of a Quality Assurance Project Plan (QAPP); preparation of Sampling and Analysis Plans (SAPs) for each property requiring environmental media sampling; and Phase II Environmental Site Assessments (PIIESA) for hazardous substance properties and the new 2012 closure rules (OAC 1301:7-9-12) for petroleum properties. The PIESAs will be conducted in accordance with the Ohio Voluntary Action Program (VAP). Site assessments will primarily focus on PIIESA and BUSTR closure assessment activities. The anticipated site assessment contractual costs are \$369,300. These costs are based on conducting the activities in the following table with the number of each activity and estimated cost for each presented.

	VAP PIPA	QAPP	SAP	VAP PIIPA	BUSTR
Est. No. :	10	1	8	3	5
Est. Cost:	\$7,500	\$8,000	\$2,400	\$47,367	\$25,000

Task 5: Cleanup Planning – The City will conduct cleanup planning (i.e., Analysis of Brownfields Cleanup Alternatives) where redevelopment is imminent and such activities will facilitate the redevelopment of the property. Four such efforts are estimate at a contractual cost of approximately \$4,000 each. Contractual costs for this task are estimated at \$16,000 based on previous experience with U.S. EPA Assessment and Cleanup grants and Clean Ohio fund.

c. Ability to Leverage

The City recognizes that successful redevelopment of brownfields after application of Assessment Grant funds will require the assemblage of funding packages that support as many elements of the redevelopment as possible. One of the most commonly used fund sources in Ohio is the Clean Ohio Fund, administrated by the JobsOhio program, which offers the best opportunity for offsetting the costs of additional environmental activities, such as additional assessments, remediation activities, demolition, hazardous materials abatement, etc. Additional short-term funding, such as tax increment financing (TIF) zones from the City, loans from the Ohio Brownfield Revolving Loan Funds (Ohio EPA, Ohio DSA, and the Water Control Board), and grants from community foundations can contribute to successful economic and greenspace redevelopments. Longer-term funding from other US EPA grants (Assessment, Cleanup, and RLF), Ohio DOT grants can supplement local and state sources when development schedules permit. Furthermore, the City has committed the entire \$50,000 of its BAP implementation grant toward a portion of the cost of a Phase II environmental assessment of the former manufactured gas plant property in the **HUB District**.

The City has facilitated many brownfield redevelopment success stories using available federal, state and private resources over the past ten years. What has become evident during that period is that a source of quickly accessible environmental assessment funding is needed in the critical early stage of brownfield redevelopment. Clean Ohio funds are declining and can take many months to obtain, are insufficient to cover the need for assessments. Much of this program is being converted and directed to developer loans. In today's economic climate, there are no local funding sources to fill this void – the EPA Assessment Grant is now the critical factor. The City's brownfields and economic development experience and their understanding of the roles and uses of the Assessment Grant and other financial support mechanisms in brownfield redevelopment, combined with the abundance of brownfields and redevelopment opportunities in the three priority areas, equals a successful Assessment Grant project and redevelopment program to offer economic and health benefits to the impoverished residents. The minimum requirements for assessing five brownfield sites will be easily achieved, probably in the first year of the project.

Local resources that can be readily accessed to support assessment and subsequent cleanup and redevelopment activities are presented in the following table; support letters are attached.

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Source	Resources Leveraged/Role of Resources	Estimated Value
City of Xenia	1) Meeting rooms, educational materials, and staff needed for press releases, meetings/hearings, website updates, etc. to support community outreach efforts. 2) Staff to document site selection/inventory process, community outreach efforts, program process, and oversee grant financial transactions to support programmatic activities. 3) Site access support (access agreements, building access, etc.) to support PIESA, PIIESA, and BUSTR activities. 4) Management of Assessment Grant in accordance with grant agreement to support programmatic activities.	\$25,000
Environmental Consultant	1) Develop Quality Assurance Project Plan 2) Assistance with community outreach services - website updates	\$5,000

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**a. Plan for Involving the Targeted Community & Other Stakeholders; and Communicating Project Progress**

Xenia believes it is important to provide its citizens opportunities to become informed, and provide their input into the brownfields program. Following notice of an award by the US EPA, the City will announce the award to the community through a press release to the Xenia Gazette, and by posting a notice on the City's website. Xenia may also place advertisements on local public and talk radio stations (WXLN 95.3 FM and WBZL 100.3 FM and 1500 AM) to reach those city residents without newspaper and internet service. The vast majority of city residents speak English. Therefore, community outreach activities will be conducted in English, but if the City is made aware of specific language or disability needs, the required translation or other support will be provided. Currently the City has identified city staff members who can assist in translation for Spanish and Portuguese.

After execution of the Cooperative Agreement, Xenia will reactivate the BAC to provide guidance and direction for the program, while also providing an opportunity to market brownfields, educate the community, and foster public participation. The BAC will meet at least quarterly and discuss program progress. BAC members will come from neighborhood organizations such as the Friends of Xenia Station (FOXs), and environmental groups such as Partners of the Environment.

The primary community input will be focused on preparation of the basic approach work plan. After a draft is prepared, it will be posted on the City's website. Hard copies will be made available at the County Library to ensure access for those without appropriate information technology availability, knowledge, or experience. The document availability and request for comments will be announced to the public via the City's website, possibly the media outlets discussed above, and notifications to key community groups. Public comments regarding the proposed project approach will be accepted during public meetings. The basic approach work plan will be modified as appropriate in response to relevant comments.

Following approval of the basic approach work plan, Xenia will seek public input regarding the brownfield site inventory at one initial kick-off meeting, to acquaint community leaders, lenders, developers, citizen groups, and other stakeholders. This meeting will be held at the City offices. Xenia will solicit nominations for additions to the existing brownfield inventory and site prioritization criteria. The City will incorporate public comments and modify the site prioritization criteria.

RANKING CRITERIA

Once a site is selected for use of grant funds, Xenia may hold a public meeting to discuss these sites within the **HUB District**. The City's community outreach program will continue through site use planning, site plan approval, and zoning review as site redevelopment ultimately progresses.

Following completion of an assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities that have occurred, providing results of the assessments, and explaining health and environmental impacts of findings. If health threats are identified, the GCCHD will become a partner in community involvement and education. GCCHD will be integral in explaining health concerns and, if assessments identify potential health threats, key in helping residents find solutions. When remediation and/or redevelopment are initiated for a site, more involvement activities, including explanations of plans, and solicitation of comments and feedback on those plans, may be implemented.

At the close of the project, the City will announce the results of the assessment and cleanup planning activities conducted under the grant. The announcement will be posted on the City's website and disseminated by other community groups to ensure that all interested parties are included in the process.

b. Partnerships with Government Agencies

The City and many of the CBOs have developed long-term relationships and partnerships with local, state and federal agencies. On a local government level, Xenia has and will continue to work closely with neighborhood councils, and other municipal administrators to stay abreast of what is happening in their neighborhoods, to educate city residents on brownfield-related topics, and to promote brownfield redevelopment.

Greene County Combined health district (GCCHD) will be involved throughout the Assessment Grant process. GCCHD will provide key support if environmental impairment is discovered and has migrated off-site with the potential to negatively impact the health of the local residents. The expertise and experience of the GCCHD will be used to help design and conduct outreach programs, if migration of contamination is confirmed. Based on previous reports issued by the Ohio Department of Health, no disease or symptomatic clusters that would indicate environmental health issues or related target contaminants associated with brownfields have been positively identified in the city or the **HUB District**.

Through its many economic redevelopment programs, Xenia has a strong and productive relationship with the Ohio EPA, Ohio Department of Transportation, and Ohio Development Services Agency. The City will continue to foster these partnerships with activities associated with the Assessment Grants. Xenia will also work closely with Ohio EPA and BUSTR to help ensure appropriate assessment and remedial activities occur at brownfields sites. This project will be conducted in compliance with the rules and guidance documents promulgated by the Ohio EPA and BUSTR. Partnering with Ohio EPA and BUSTR staff will be important for acquisition of technical support, resolution of regulatory issues, and interpretation of rules and guidance documents. The cooperation also will be important to ensure access to the Clean Ohio Fund program and proper uses of those grant funds.

When contamination is encountered on brownfield sites, the remediation criteria established by the Ohio EPA or by BUSTR will be used to identify and address on-site health and environmental threats posed by this contamination. If contamination discovered through assessment of brownfields has the potential to negatively impact environmental justice as to the health of local residents, especially as related to off-site exposures, the Ohio EPA or BUSTR, Ohio Department of Health, and GCCHD will be notified and brought in as project partners.

There are no EPA Environmental Workforce Development and Job Training programs currently operating in Xenia. However, there are two local universities (Central State University and Cedarville University), which

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have environmental science programs which the City will reach out to in hopes of engaging them in this brownfield redevelopment effort.

c. Partnerships with Community Organizations

The organizations listed below have pledged their support as partners in the City's US EPA brownfields grant initiative. Letters of support from each organization is included in Attachment iv. Each organization will serve in specific role(s) within the project:

Organization Type	Community Organizations	Potential Role/Commitment
Business	Xenia Area Chamber of Commerce	1) Assist with community outreach services
Community Service	Friends of Xenia Station	1) Assist with community outreach services
County Service	Greene County Combined Health District	1. Provide health information for each of the 18 properties. 2. Assist in risk evaluation if requested. 3. Assist with community outreach services
	Greene County Parks & Trails	1. Assist with community outreach services 2. Assist the City in maintenance of bike trail system
	Greene County Public Library	1. Assist with community outreach services 2. Conduct additional research beyond work conducted for BAP
Environmental	Partners for the Environment	1. Assist with community outreach services by providing the opportunity to speak at its regional meeting

4. PROJECT BENEFITS**a. Health and/or Welfare and Environment**

The Brownfield Action Plan and the City's Comprehensive Plan envision the **HUB District** neighborhood as a "Gateway" to the community. The plans aim to capitalize on the confluence of the regional bikeway system to transform this blighted and disadvantaged neighborhood into a "green" walkable community focused on trails and outdoor recreation space, which promotes a healthier lifestyle for residents and creates economic health through investment opportunities focused on an active lifestyle market.

Other key benefits include reductions in health and welfare threats which are beneficial to the disproportionately affected, underprivileged residents, helping to address environmental justice issues these sites present, and reduction of crime associated with abandoned, dilapidated buildings. Cleanup and redevelopment of these sites will greatly reduce current threats to residents living, working, shopping, learning, and playing in those areas. Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits the residents.

Shawnee Creek, a tributary of the Little Miami Scenic River, runs through the **HUB District**. The creek is adjacent to several of the identified brownfield properties. The creek is not monitored by the Ohio EPA on a regular basis. The assessment grant will provide an opportunity to examine the potential impact of suspected contaminants on water quality in both Shawnee Creek and the Little Miami.

For the City, quality of life is of vital importance to its residents. Xenia recognizes the important contribution that green space and the natural environment play in the social, cultural, economic and personal well-being of City residents as well as a strong visitor attraction.

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b. Economic Benefits from Infrastructure Reuse/Sustainable Reuse

The economic health of the City of Xenia is a balance between services provided by the City and its residents, and maintaining a stream of revenue to fund those services. Xenia's revenue streams are derived from property, sales, and income taxes. Vacant brownfields represent a significant tax drain. While generating minimal tax revenue, brownfields still incur a cost of services which, in some cases, may include elevated levels of police protection and fire protection risk commonly associated with abandoned buildings. Assessing brownfields to allow for their eventual remediation and redevelopment will help to remove this tax drain and will remove environmental barriers to redevelopment.

An additional benefit is that by redeveloping land within the existing developed portions of the City, the costs of providing municipal services, such as fire protection, and police, will be relatively the same because it is located within the confines of an already serviced area. Re-use of brownfields property will also help to prevent further loss of open space, will effectively reutilize existing public-sector infrastructure including electric, roads, sanitary sewer, water and storm water, as well as private-sector infrastructure such as telephone, cable telecommunications and natural gas. The initial costs for redevelopment may be greater than in an undeveloped site, but the overall sustainability will be greater and long-term fiscal impact to Xenia will be less.

The City's goals are focused on (1) increasing the tax base; (2) enhancing property values; (3) facilitating job creation; (4) utilizing existing infrastructure; and (5) encouraging the reuse of built land rather than undeveloped land. Completing assessments of the **HUB District's** brownfields sites will help to achieve these goals by decreasing the environmental stigma that can prevent investment in brownfields properties and paving the way for more sustainable development efforts.

More specifically, the funds provided by this program will allow the City to further develop a more robust and complete brownfields inventory that clearly delineates environmental issues that have been identified and possible solutions to remediate such issues. Once these environmental issues are identified, Xenia will be in a more informed position to develop metrics to measure program success. It should be noted that the City strongly believes that any development assists with one of its primary development goals which is to promote sustainability of Xenia's assets. Most notably, redevelopment of these existing sites will increase the user base of the existing public and private infrastructure while not requiring expensive extensions of infrastructure.

c. Economic or non-Economic Benefits (Long-term benefits)

The greatest economic benefits of brownfields redevelopment will be increased jobs, economic activity, and tax revenues, and improved community health. Residents in the **HUB District** will once again have access to nearby jobs and retail services. Redevelopment of manufacturing sites for commercial and/or manufacturing reuse is a high priority. The City's goal is to replace as many of the previously lost, higher wage jobs as possible for neighborhood residents. This will be accomplished by attracting new businesses to defunct manufacturing sites and improving the attractiveness of the community through open space, transportation alternatives, and creating healthier sustainable developments. Assessment Grant funds will help new businesses offset the higher costs of environmental due diligence, site cleanup and redevelopment planning, and exposure controls to add incentives to converting the Xenia's existing brownfields into new homes for their companies.

Many times, redevelopment/reuse of smaller retail/commercial sites can be nearly as important as redevelopment of larger sites particularly for the **HUB District**. Direct economic impacts include the loss of jobs and economic activity. Indirect impacts include vacant and decaying buildings that cause blight, crime, emigration of other businesses, and decreased property values. Redevelopment of smaller brownfields in the **HUB District**, and surrounding neighborhoods with mixed-use commercial/residential redevelopments

RANKING CRITERIA

will help create affordable housing with easy access to downtown commercial and retail amenities. Brownfields redevelopment will benefit the City through increased property values and improved image. Redevelopment supported by Assessment Grant funds will attract new businesses to provide desperately needed jobs to a disenfranchised work force and return idle properties to productive, tax generating uses, which will increase property values and revenues to the City. Higher tax revenues will produce another major benefit in the form of strengthened City government operations. Increased tax revenues will allow the City to improve provision of critical services, increase economic development activities, provide additional resources to address more brownfields, and reap the attendant benefits of brownfields redevelopment. These outcomes coincide with the guiding Livability Principles⁸ of valuing and supporting community neighborhoods and increasing economic competitiveness.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCES**a. Programmatic Capability**

Xenia is ready to implement and manage this Assessment Grant, and if awarded, will seek to begin community outreach and property access activities prior to the Cooperative Agreement approval. The City will dedicate and maintain a grant management team during the entire grant period. Xenia's Development Department will manage the grant and report to USEPA. The department has a competent staff that understands procedures and requirements associated with federal and state grants having managed many over the past ten years. Mr. Steven Brodsky, CEDFP has been the Development Director for the City of Xenia since November 2011. Previously he was the Executive Director of the Xenia Economic Growth Corporation for six years. He is responsible for administering the City's economic development plan, including attraction and retention activities and its revolving loan fund programs. He has also administered several grant projects and programs, including five Clean Ohio grants, a FEMA PDM grant, and the City's CDBG program. Prior to coming to Xenia, he served as the Development Director for the City of Parkersburg, West Virginia for eight years where he administered a U.S. EPA Assessment grant for petroleum as well as the City's CDBG and HOME programs and numerous other state and federal grants. The City's plan for management continuity in the unlikely event of personnel changes relies on an experienced and readily available project manager on City staff, and an experienced environmental consultant. Mr. Brian Forschner, AICP, City Planner will help coordinate the grant. Mr. Forschner can immediately step in as project manager if needed. He has 13 years of experience in economic and community development, historical preservation, legislative support, and community planning. He led the completion of the City's X-Plan as well as the BAP. Prior to joining the City, Mr. Forschner was involved with the City of Middletown, Ohio's brownfield assessment grant and has taken training in the use of ACRES and grant management from U.S. EPA Region 5 in Chicago.

Xenia also understands that the key aspects of a successful Assessment Grant project will be open communications and working closely with the community, businesses, and developers. The resources and expertise of the US EPA Region 5 personnel, Ohio EPA and BUSTR personnel, the City, and the resources at the Ohio DSA will be essential and vital to the success of the Xenia's Assessment Grant program.

The City also understands that technical expertise will be needed. Through a qualifications based bid process, the City will retain a qualified environmental consultant to assist in managing the activities funded by the grant. The process will include evaluating the number of USEPA Grants the environmental consultant has helped manage; the consultant's understanding of the grant process and program documents required by USEPA; and the consultant's ability to assist with community outreach and education. The consultant will also be evaluated on their experience with the following: environmental regulations and Ohio EPA and State Fire Marshall requirements and policies, particularly VAP and BUSTR;

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environmental due diligence; transactions of environmentally impaired property; environmental site assessments; brownfield redevelopment and financing; and community outreach activities.

b. Audit Findings

The City of Xenia has had no adverse audit findings in the past 6 years. Xenia has not received adverse audit findings from an OMB Circular A-133 audit, an audit conducted by a federal, state, or local government inspector or similar organization.

c. Past Performance and Accomplishments

The City has not received a U.S. EPA Brownfields Grant; however, Xenia has successfully applied for, received, and managed other federal and/or state assistance agreements. The City has significant recent experience, within the past 3 years, in managing federal and state assistance agreements, examples of which are described in the table below.

Grant Source	Grant Award	Grant Summary	Compliance
Ohio Department of Development	\$50,000	Brownfields Action Planning grant to develop and initiate implementation of a plan to address brownfields redevelopment within the City. This grant is the catalyst for this Assessment Grant application.	Meet Schedule and Budget requirements
	\$2,258,600	Clean Ohio Assistance and Revitalization Fund grants to assess, remediate and redevelop the former Hooven & Alison Cordage Company complex. The redevelopment of this brownfields is expected to create from 50 to 100 jobs over the next three years.	Cleanup complete, ahead of schedule and on budget
	\$3,113,100	Clean Ohio Assistance and Revitalization Fund grants to assess, remediate and redevelop the former Ohio Valley Children's Home complex for additional development opportunities, including a new radio station and associated operation by Strong Tower Media Corp.	Project is complete, ahead of schedule and on budget
HUD	\$560,000	The Community Home Investment Program (CHIP) award was used by the City to address the needs of affordable housing development within Xenia which has a high non-ownership rate. The funds were used to provide down payment assistance and/or homeowner rehabilitation funding to eligible low- and low-moderate income households within two of the City's census tracts, one of which encompasses a major portion of the HUB District.	Meet Schedule and Budget requirements
FEMA	\$554,000	Pre-Disaster Mitigation Grant as part of a \$743,589 project to purchase five residential structures, relocate the residents and demolish the structures.	Meet Schedule and Budget requirements

In all of these grants, the City of Xenia has continually met all budget, scheduling, reporting, and milestone requirements, demonstrated by their success in obtaining multiple grants from both federal and state entities. The City has the procedural knowledge to successfully disburse Assessment Grant funds and track grant expenditures.

Attachment i
Threshold Documentation

THRESHOLD CRITERIA

1. APPLICANT ELIGIBILITY

The City of Xenia is an eligible applicant, per U.S. EPA guidelines, as a general purpose unit of local government, as defined under 40 CFR Part 31.

2. LETTER FROM STATE ENVIRONMENTAL AUTHORITY

Letters of support of the Ohio Environmental Protection Agency and the Ohio Bureau of Underground Storage Tank Regulations are included as **Attachment ii**.

3. COMMUNITY INVOLVEMENT

Xenia believes it is important to provide its citizens opportunities to become informed, and provide their input into the brownfields program. The City has already begun the process of community outreach and education regarding brownfield issues through its Brownfield Action Plan (BAP). The BAP included meetings with the general public, potential brownfield owners, and a Brownfield Action Committee.

This multi-faceted process will continue and increase with the USEPA assessment grant. Outreach will utilize a multi-media approach to ensure that all residents are reached, including those with specific language or disability needs. The City will reactivate its Brownfield Action Committee (BAC) to bring together key community stakeholders and foster awareness and education. Numerous community organizations have pledged support (see Attachment iv) and will be invited to participate with the BAC.

Community involvement efforts will initially focus on development of a work plan and the City's inventory of potential brownfields developed during the BAP. Once a site is selected for the use of grant funds, community outreach efforts will provide information about the assessment process and outcomes, as well as a summary report and announcement at the end of the grant project.

The City will also leverage its strong relationships with other government agencies such as the Greene County Combined Health District (GCCHD), Ohio EPA, Ohio Department of Transportation, Ohio Development Services Agency and BUSTR with assessment grant activities. GCCHD will provide key support if significant public environmental health issues are discovered. The City will work closely with Ohio EPA and BUSTR to obtain technical guidance and ensure regulatory and procedural compliance. Cooperation with the Ohio Development Services Agency and its Clean Ohio program will help the City identify remediation resources.

4. SITE ELIGIBILITY AND PROPERTY OWNERSHIP ELIGIBILITY

This section is not applicable. The City of Xenia is requesting funds under the community-wide designation and has not selected specific sites. The City of Xenia intends to use funding to assess, characterize and prioritize multiple eligible sites within the City of Xenia, Ohio.

Attachment ii
Letters from State Environmental Authority



DEVELOPMENT DEPARTMENT

101 N. DETROIT ST. XENIA, OH 45385 (937) 372-6380 (937) 372-8151(FAX) WWW.CI.XENIA.OH.US

December 5, 2014

Ms. Megan Oravec
Training and Outreach Coordinator
Ohio EPA
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

RE: **Request for Ohio EPA Letter of Support
USEPA Brownfields Grant – Community-wide Assessment
City of Xenia, Green County, OH – Hub District**

Dear Ms. Oravec:

The City of Xenia is requesting a letter of support for the City's U.S. EPA Brownfields Community-wide Assessment Grant application for properties located within the Hub District in the city limits of Xenia, Ohio. The focus of this grant application is to provide environmental due diligence assistance for properties looking to undergo economic development but held up due to environmental stigma.

The following information is provided per Ohio EPA guidelines:

A. Grant Requested:

- i. Grant Type: Community-wide Assessment – Combined Hazardous Substance and Petroleum
- ii. Federal Funds Requested: \$400,000 (\$200,000 each grant type)

B. Property Name and Address:

This is a Community-Wide (City of Xenia) Assessment application. The City has tentatively identified 18 properties within the area of the City called the Hub District for consideration of environmental due diligence. This area was selected as part of the City's Brownfield Planning project funded by the Ohio Department of Development. Table 1 identifies these 18 properties to be considered for due diligence efforts.

C. Proposed Use of Subtitle A Funds

The City of Xenia is proposing the following uses of the Subtitle A funds:

- Community Meeting: Estimate of no more than 4
- Phase I Property Assessments : 10
- Quality Assurance Project Plans : 1
- Sampling and Analysis Plans : 4
- Phase II Property Assessments : 4
- Analysis of Brownfield Cleanup Alternatives: 4

D. Community Needs

The Hub District is in the core of the City, and includes some of the oldest industrial properties in the City. The housing stock is also old, as many homes were built to house the industrial and railroad workers of 1920s through 1940s. The area is primarily in Census Tract 2406, which according to 2010 Census data (latest available) had more than 41 percent of the housing stock built prior to 1940. This also is among the more economically disadvantaged areas of the City, with some 28.6 percent of the 5,528 residents living below the poverty line.

E. Leveraging of Additional Resources

As part of the City's overall effort to increase their economic base as well as increasing public benefits, especially health (e.g. bike trails), the City has taken advantage of the Clean Ohio program both the assistance fund (\$275,900) and the revitalization fund (\$5,421,800). However for the Hub District, the City applied for and received a Brownfield Action Program grant from the Ohio Department of Development. This grant has allowed the City to develop the planning necessary to revitalize this area both economically and provide health benefits to the local citizens and residents in the form of reduced contaminants in the environmental and great physical fitness opportunities in the form of the enhancement of the existing bike trails.

In addition, the City is planning on a community outreach effort for not only the residents of the District but also the City's residents as well. To that end, the City has begun contacting local neighborhood organizations, churches, and other community organizations to participate in the community outreach by providing meeting venues, posting of meeting notes and information on websites and in church bulletins. An effort will be made to educate the heads of these groups such that they become part of the team assisting the City in making the redevelopment of the District a reality and identifying opportunities for increased economic and health benefits to their members.

F. Expected Benefits

This grant will allow the City to continue their efforts within the Hub District to revitalize it by increasing job opportunities upon development of the underutilized sites of which the Brownfield Action program grant has identified approximately 19 sites, to encourage greater investment in the District and create more opportunities for the increased physical fitness of the residents of Xenia through the enhancement of the existing bike trails.

Thank you for your support of our application. Please do not hesitate to call me at (937) 372-7943 for clarification on any issue.

Respectfully Submitted,



Steve Brodsky
Development Director
City of Xenia

Cc: Table 1

Target sites within the Hub District Planning Area:

1. 71 E. Second Street
2. 214 South King Street
3. 17 West Third Street
4. 224 South Detroit Street
5. 261 South Collier Street
6. 249 Sycamore Street
7. 309 South Detroit Street (a)
8. 309 South Detroit Street (b)
9. 283 South Detroit Street
10. 263 South Detroit Street
11. 89 Leaman Street
12. 269 South Whiteman Street
13. 72 Hill Street
14. 369 South Detroit Street
15. 33 Hill Street
16. 95 Hill Street
17. 134 Washington Street
18. 168 Washington Street
19. Home Avenue



Image 7: City of Xenia Brownfield Planning Area, with potential brownfields highlighted. source: City of Xenia



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 17, 2014

U.S. Environmental Protection Agency, Region 5
Brownfields/NPL Reuse Section
ATTN: Brad Bradley and Romona Smith
77 West Jackson Blvd., Mail Code SM-7J
Chicago, IL 60604-3507

RE: City of Xenia Community Wide Assessment Grant Proposal

Dear Mr. Bradley and Ms. Smith:

I am pleased to offer Ohio EPA's support for the City of Xenia Community Wide Assessment Grant Proposal. We have worked with the City of Xenia in the past and hope to be able to provide support to the City of Xenia under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding the City of Xenia is requesting under their community wide assessment grant proposal would be used to complete Phase I and Phase II Environmental Site Assessments, hold community meetings, and to develop Quality Assurance Project Plans, Sampling and Analysis Plans, and Analysis of Brownfield Cleanup Alternatives. If awarded, this funding would be used in the Hub District, which is located in the core of the City and includes some of the oldest industrial properties in the City. This funding would allow the City to continue its revitalization efforts within the Hub District by increasing job opportunities upon development of underutilized sites, to encourage greater investment in the Hub District, and by creating more opportunities for physical fitness through the enhancement of existing bike trails.

We look forward to working with the City of Xenia and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2285.

Sincerely,

Amy Yersavich, Manager
Ohio Environmental Protection Agency
Site Assistance and Brownfield Revitalization

cc: Steve Brodsky, Development Director
Mike Starkey, Ohio EPA, DERR/SWDO



DEVELOPMENT DEPARTMENT

101 N. DETROIT ST. XENIA, OH 45385 (937) 372-6389 (937) 372-8151(FAX) WWW.CLXENIA.OH.US

December 5, 2014

Mr. Verne Ord, Assistant Chief
Ohio Department of Commerce
State Fire Marshal
Bureau of Underground Storage Tank Regulations
8895 East Main Street
Reynoldsburg, OH 43068

RE: **Request for BUSTR Letter of Support**
USEPA Brownfields Grant – Community-wide Assessment
City of Xenia, Green County, OH – Hub District

Dear Mr. Ord:

The City of Xenia is requesting a letter of support for the City's U.S. EPA Brownfields Community-wide Assessment Grant application for properties located within the Hub District in the city limits of Xenia, Ohio. The focus of this grant application is to provide environmental due diligence assistance for properties looking to undergo economic development but held up due to environmental stigma.

The following information is provided per BUSTR guidelines:

A. Grant Requested:

- i. Grant Type: Community-wide Assessment – Combined Hazardous Substance and Petroleum
- ii. Federal Funds Requested: \$400,000 (\$200,000 each grant type)

B. Property Name and Address(es):

This is a Community-Wide (City of Xenia) Assessment application. The City has identified 18 properties within the area of the City called the Hub District for consideration of environmental due diligence. This area was selected as part of the City's Brownfield Planning project funded by the Ohio Department of Development. Table 1 identifies these 18 properties to be considered for due diligence efforts.

C. Property Owner Name(s) and Address(es):

This is a Community-wide Assessment application. The City has identified approximately 18 properties that are being considered for due diligence. See Table 1 for the names and address of the properties including current owners.

D. Community Needs

The Hub District is in the core of the City, and includes some of the oldest industrial properties in the City. The housing stock is also old, as many homes were built to house the industrial and railroad workers of 1920s through 1940s. The area is primarily in Census Tract 2406, which according to 2010 Census data (latest available) had more than 41 percent of the housing stock built prior to 1940. This also is among the more economically disadvantaged areas of the City, with some 28.6 percent of the 5,528 residents living below the poverty line.

E. Proposed Use of Funds and Leveraging of Additional Resources

The City of Xenia is proposing the following uses of the Subtitle A funds:

- Community Meeting: Estimate of no more than 4
- Phase I Property Assessments : 10
- Quality Assurance Project Plans : 1
- Sampling and Analysis Plans : 4
- Phase II Property Assessments : 4
- Analysis of Brownfield Cleanup Alternatives: 4

F. Expected Benefits

This grant will allow the City to continue their efforts within the Hub District to revitalize it by increasing job opportunities upon development of the underutilized sites of which the Brownfield Action program grant has identified approximately 19 sites, to encourage greater investment in the District and create more opportunities for the increased physical fitness of the residents of Xenia through the enhancement of the existing bike trails.

G. Current and Immediate Past Owners

The City has identified approximately 18 properties that are being considered for due diligence. See Table 1 for the names and address of the properties including current owners. Due diligence will be needed to identify past owners.

H. Acquisition of Site

Acquisition of the properties by the City may or may not happen with few exceptions. Even these exceptions would not occur until well after the environmental due diligence is completed.

I. No Responsible Party Status

As part of the due diligence effort, responsible party evaluation will be a key criterion with regards to deciding whether a property is to be assessed.

J. Cleaned Up by a Person Not Potentially Liable

The City has not dispensed or disposed of petroleum or petroleum product or exacerbated the existing petroleum contamination at any of the proposed properties to be assessed; and will take reasonable steps with regard to the contamination at these properties.

K. Relatively Low Risk

As part of the due diligence effort, the evaluation of the property with regards to 'low risk' will be a key criterion with regards to deciding whether a property is to be assessed. The City plans to work closely with the regional BUSTR Coordinator as well as the City's Fire Marshall to make this determination.

L. Judgments, Orders, or Third Party Suits

As part of the due diligence effort, the evaluation of the property with regards to 'judgments, orders, or third party suits' will be a key criterion with regards to deciding whether a property is to be assessed.

M. Subject to RCRA

It is unknown at this time whether any of the properties to be assessed are currently subject to any order under Section 9003(h) of the Solid Waste Disposal Act. As part of the due diligence effort, the evaluation of the property with regards to 'RCRA orders' will be a key criterion with regards to deciding whether a property is to be assessed.

N. Financial Viability of Responsibilities Parties

As part of the due diligence effort, the evaluation of the property with regards to 'financial viability of a responsible party' will be a key criterion with regards to deciding whether a property is to be assessed.

Thank you for your support of our application. Please do not hesitate to call me at (937) 372-7943 for clarification on any issue.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Steve Brodsky", with a long, sweeping horizontal line extending to the right.

Steve Brodsky
Development Director
City of Xenia

Cc: Table 1

Target sites within the Hub District Planning Area:

- | | |
|---------------------------------|-------------------------------|
| 1. 71 E. Second Street | 11. 89 Leaman Street |
| 2. 214 South King Street | 12. 269 South Whiteman Street |
| 3. 17 West Third Street | 13. 72 Hill Street |
| 4. 224 South Detroit Street | 14. 369 South Detroit Street |
| 5. 261 South Collier Street | 15. 33 Hill Street |
| 6. 249 Sycamore Street | 16. 95 Hill Street |
| 7. 309 South Detroit Street (a) | 17. 134 Washington Street |
| 8. 309 South Detroit Street (b) | 18. 168 Washington Street |
| 9. 283 South Detroit Street | 19. Home Avenue |
| 10. 263 South Detroit Street | |

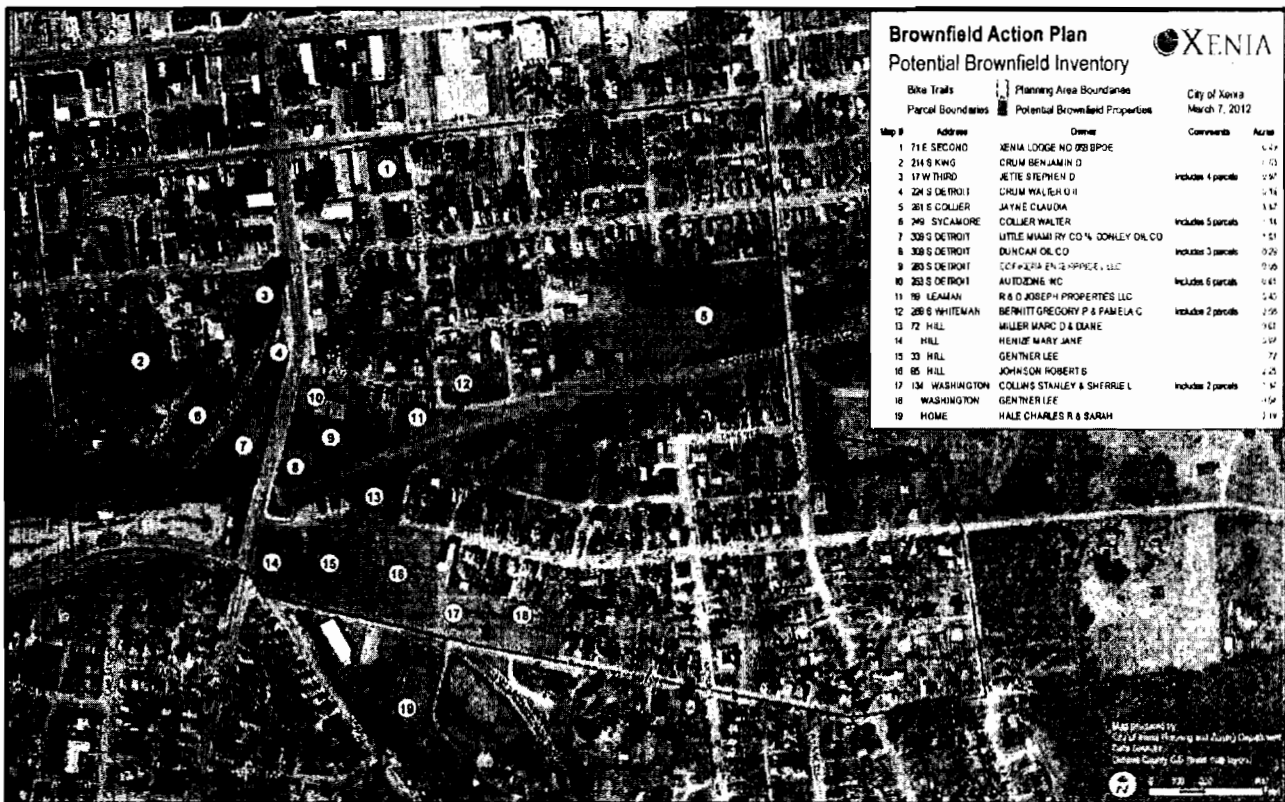


Image 7: City of Xenia Brownfield Planning Area, with potential brownfields highlighted. source: City of Xenia



**Department
of Commerce**

Division of State Fire Marshal
John R. Kasich, Governor
David Goodman, Director

December 9, 2014

Joe Dufficy
U.S. EPA Brownfield Contact, Region 5
Community and Land Revitalization Branch
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Mail Code SM-7J
Chicago, IL 60604-3507

Subject: City of Xenia - USEPA Brownfield Assessment Grant proposal

Dear Mr. Dufficy:

This letter acknowledges that the City of Xenia notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use \$200,000 of the total \$400,000 grant proposal for a community-wide brownfield assessment for petroleum waste. Sites being considered are old industrial and commercial facilities residences and vacant land in the area of the City called the Hub District.

This project is a part of a redevelopment project in Xenia. The Hub District is in the core of the City and includes some of the oldest industrial properties in the City. The City has identified approximately 18 key sites to target by the grant in one of the most economically disadvantaged areas of the City. The City hopes to assess, clean up and raze former industrial facilities, eliminating threats to the environment and public health and providing opportunities for redevelopment and revitalization of the local community and economy and to increase physical fitness of the residents of Xenia through the enhancement of the existing bike trails.

I am pleased to offer BUSTR's support for the City of Xenia Brownfield Assessment Grant proposal. We look forward to working with the City of Xenia and the U.S.EPA on this project.

Sincerely,

Verne A. Ord
Assistant Chief – BUSTR
Division of State Fire Marshal
Ohio Department of Commerce

xc: Site File
Steve Brodsky, City of Xenia Development Director

Bureau of Underground Storage Tank Regulations
8895 East Main Street
Reynoldsburg, OH 43068 USA

614/752 7938
Fax 614/752 7942
TTY/TDD 800/750 0750
www.com.ohio.gov

Attachment iii
Applicant Eligibility Documents

The applicant is the City of Xenia, who has not received an assessment grant from USEPA in Fiscal Year 2013 nor is a member of a coalition that was awarded a grant in Fiscal Year 2013. As the applicant is a City, this attachment is not applicable.

Attachment iv
Letters from Community-Based Organizations



www.greenelibrary.info

Administrative Offices
76 East Market Street
PO Box 520
Xenia, OH 45385-0520
937.736.7050
Fax: 937.372.4673

December 15, 2014

Mr. Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia OH 45385

RE: Letter of Support
City of Xenia-USEPA Brownfield Assessment Grant Application

Dear Mr. Brodsky:

The Greene County Public Library would like to express our support of the City of Xenia as you apply for a USEPA Communitywide Assessment Grant for the HUB District.

The Greene County Public Library was established for the benefit of all Greene County residents. We not only provide a connection to reading and lifelong learning, but access to a wealth of local information. The staff at our seven local branches is dedicated to assisting our citizens find the information and resources to help them grow.

As part of the City's Brownfield Action Plan local committee, we were happy to research past uses to help the City locate potential brownfields within the HUD district. We understand the City would like to take the next step and use the USEPA grant City to characterize and assess any potential environmental contaminants or other conditions at those identified sites, and then develop an action plan to remediate and redevelop these sites.

We are glad to continue to serve on any local committee that may be created as you move forward in this process, and will also continue through our reference services to provide additional information where possible.

The Greene County Public Library looks forward to working with the City on this community project.

Sincerely,

Karl Colón

Greene County Public Library Director



December 10, 2014

Mr. Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia OH 45385

RE: Letter of Support
City of Xenia-USEPA Brownfield Assessment Grant Application

Dear Mr. Brodsky:

Friends of Xenia Station (FOXs) is dedicated to promoting and preserving Xenia Station. We recognize it to be a true community asset, and want to ensure it will continue to be used by the community for generations to come. To that end, FOXs is pleased to provide our support to the City of Xenia in your application to the USEPA for a Communitywide Assessment to assess the area known as the IIUB District.

Although a relatively new organization, FOXs has already made a large impact as dozens of volunteers have spent countless hours fulfilling our mission, to preserve Xenia Station, the park in which it resides, and the multi-use trails radiating from it; as a valued city landmark, and to explore ways to promote and enhance its cultural, historical, and economic value to our community.

FOXs continues to grow, and we are happy to support the City's efforts to improve the area around Xenia Station and the bike trails. We have discussed purchasing a parcel adjacent to the Station, but do have concerns about the potential of environmental contamination due to past uses in the area. Having the grant and the ability to know for certain what needs to be done will help us make a more informed decision.

It is our understanding the City will use the USEPA grant to inventory potential brownfield sites, assess environmental conditions and determine if they may pose a risk to human or environmental health, and then develop a plan to remediate and redevelop these sites.

FOXs will work with the City to promote this effort, assist with communicating information to our members and other trail users, and will continue to work with the City on the maintenance of Xenia Station and the area surrounding it.

We look forward to working with the City on this exciting project.

Sincerely,

Dennis Lewis
FOXs Chair

Friends of Xenia Station c/o 2010 Kitty Hawk Dr., Xenia, OH 45385
Ph: 937-376-1080 E-mail: info@xeniastation.org Website: www.xeniastation.org



GREENE COUNTY | PARKS & TRAILS

December 16, 2014
Mr. Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia, OH 45385

RE: Letter of Support - City of Xenia-USEPA Brownfield Assessment Grant Application

Dear Mr. Brodsky:

Greene County Parks & Trails would like to express our support of the City of Xenia in your application to the USEPA for a Communitywide Assessment to assess the area known as the HUB District. Serving as it does as the trail head for four recreational trails, the continued improvement of the area around Xenia Station is an important effort for the City of Xenia and the region.

As you know Greene County Parks & Trails helps maintain the 62 miles of recreational trails throughout Greene County, providing services to the tens of thousands of trail users annually. This includes providing patrols through our Ranger Division, maintenance of the paved trails and working with many volunteers including the Trail Sentinels to protect the health, safety and welfare of our citizens and visitors. Improving the conditions and promoting redevelopment along these wonderful recreational corridors will help us meet our mission of conserving and promoting Greene County's natural and cultural treasures as an exceptional destination for outdoor experiences while enhancing the quality of life for citizens and visitors.

It is our understanding the City of Xenia will use the USEPA grant to inventory potential brownfield sites, assess environmental conditions and determine if they may pose a risk to human or environmental health, and then develop a plan to remediate and redevelop these sites.

Greene County Parks & Trails is willing to work with the City of Xenia to promote this effort, assist with communicating pertinent information to our users, and will continue to work with the City on the maintenance of the trail system.

We look forward to working with the City of Xenia on this important initiative.

Sincerely,

Chrisbell Bednar
Director

575 Ledbetter Road • Xenia, OH 45385 • Phone: (937) 562-6440 • Fax: (937) 562-6455 • www.gcparkstrails.com



GREENE COUNTY COMMISSIONERS

Alan G. Anderson
Robert J. Glaser, Jr.
Tom Koogler

GREENE COUNTY ADMINISTRATOR

Brandon Huddleson

DIRECTOR OF PARKS & TRAILS

Chrisbell M. Bednar

PARK DISTRICT COMMISSIONERS

John A. Finlay, President
Anthony F. Sculimbrene
R. Douglas McLarty





334 W. Market Street
Xenia, OH 45385
Phone: 937-372-3591
Fax: 937-372-2192
E-mail: xacc@xacc.com
www.xacc.com

Mr. Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia OH 45385

Dear Mr. Brodsky:

The Xenia Area Chamber of Commerce strongly supports the City of Xenia in your application to the USEPA for a Communitywide Assessment to assess the area known as the HUB District, and will be an active partner on this project.

The Chamber has a long history of working with the City to improve business conditions and promote the quality of life of the Xenia area. Xenia Station and the area surrounding it (the HUB District) are focal points of tourism and the Chamber has worked to promote the trails and assist our business community in marketing to the thousands of bike riders and other trail users. We recognize this area as an important economic asset to the community.

We believe these efforts will be enhanced by this USEPA grant. As we understand, the City will inventory potential brownfield sites, assess environmental conditions and determine what further actions may be required, and then develop a plan to remediate and redevelop these sites.

The Xenia Area Chamber of Commerce will assist the City with these efforts. We understand that community participation and communication is an important aspect of the process. To that end, we will use our website and weekly e-newsletter to promote meetings and provide information where possible. If needed, we are also happy to open the Chamber's meeting room for your use in conducting meetings.

Please let us know how we can be of further assistance. We look forward to working with the City and support your efforts to secure funding for this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Liming". The signature is stylized with a large, sweeping flourish that extends to the right.

Alan Liming
President



Public Health
Prevent. Promote. Protect.

Greene County Combined Health District

Melissa Howell, MS, MBA, MPH, RN, RS, Health Commissioner

Robert P. Dillaplain, MD, Medical Director

December 8, 2014

Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia, OH 45385

RE: Letter of Support
City of Xenia-USEPA Brownfield Assessment Grant Application

Dear Mr. Brodsky:

The Greene County Combined Health District is pleased to support the efforts of the City of Xenia as you apply for a Communitywide Assessment Grant through the US Environmental Protection Agency to assess the area known as the HUB District.

The health district has a long history of working with the City of Xenia to promote, protect and improve the health of its citizens, as well as the citizens of all of Greene County. We do this through promoting a clean, healthy environment; providing health services; education on healthy life styles, and promotion of community wellness and preventative health measures.

We understand the purpose of this grant is to allow the City to inventory possible brownfield sites, and characterize and assess potential environmental contaminants or other conditions that may pose a risk to human or environmental health, as well as begin to develop an action plan to remediate and redevelop these sites. This will further the work already completed as part of the Brownfield Action Plan grant through the State of Ohio, of which we have been a part.

The health district will provide available health information in the impacted areas of the HUB district, and work with the City to help the residents, businesses and other citizens understand what those impacts may be.

Thank you for including us in your planning efforts. We look forward to working with the City on this important initiative.

Sincerely,

Melissa Howell
Greene County Health Commissioner

360 Wilson Drive • Xenia, Ohio 45385
(937) 374-5600 • toll free (866) 858-3588 • Fax (937) 374-5675
www.gcchd.org



**PARTNERS FOR THE
ENVIRONMENT**

38 E. Monument Avenue
Dayton, Ohio 45402
937-223-1271X3210
www.qdpartners.org

THE PARTNERS FOR THE ENVIRONMENT is an alliance of environmental organizations, government and civic organizations, and public and private educational institutions. These organizations share the common goal of protecting, restoring, preserving, and promoting the environmental and agricultural resources of the Great Miami River and Little Miami River Watersheds – an 18 county region in southwest Ohio.

Steering Committee

Bob Junick, Co-Chair
Sarah Hippensteel Hall,
Co-Chair
Becky Benna
Ivin Bieser, Jr.
Larry Frimerman
Charity Krueger
Leslie King
Deb Oexmann
Eric Sauer
Teri Schoch
Jeff Thomas

December 8, 2014

Mr. Steve Brodsky
Development Director
City of Xenia
966 Towler Road
Xenia OH 45385

RE: Letter of Support for the City of Xenia-USEPA Brownfield Assessment Grant Application

Dear Mr. Brodsky:

Please accept this letter as support by the Partners for the Environment for the City of Xenia's application for a USEPA Communitywide Assessment Grant. The intent of the project is to assess the area known as the HUB District. The project addresses the quality of Shawnee Creek, which flows through the HUB district and at a minimum the grant will help the City have a better understanding of the nature and extent of potential environmental contaminants in that stream.

The Partners for the Environment is an alliance of more than 50 environmental organizations, government and civic organizations, and public and private educational institutions. Our mission is to coordinate, champion, and leverage resources to help organizations who work to protect, preserve, and restore the environmental and agricultural resources of the Great Miami River and Little Miami River watersheds. Shawnee Creek is a major tributary of the Little Miami River and flows through the project area.

The Partners for the Environment is supportive of projects that work to protect and improve the environmental quality of our communities. The Partner for the Environment hosts quarterly meetings for member organizations who work on issues of the environment where the City of Xenia may report on this project and reach out to community members.

Good luck in pursuing the grant. Please contact us with any questions.

Sincerely,

Sarah Hippensteel Hall, PhD
Co-Chair

MICHAEL R. TURNER

TENTH DISTRICT, OHIO

COMMITTEE ON ARMED SERVICES

CHAIRMAN

SUBCOMMITTEE ON
TACTICAL AIR AND LAND FORCES

COMMITTEE ON OVERSIGHT AND
GOVERNMENT REFORM

ASSISTANT MAJORITY WHIP



Congress of the United States
House of Representatives
Washington, DC 20515

2239 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-6465

DISTRICT OFFICE

120 WEST 3RD STREET
SUITE 305
DAYTON, OH 45402
(937) 275-2843

December 11, 2014

U.S. Environmental Protection Agency, Region 5
Brownfields and Early Action Section
Atten: Linda Mangrum and Kelley Moore
77 West Jackson Boulevard
Mail Code SM-7J
Chicago, IL 60604-3507

Re: City of Xenia, Ohio- Community-Wide Assessment Grant Proposal

Dear Ms. Mangrum and Ms. Moore:

I write in support of the application submitted by the City of Xenia, located in the 10th Congressional District of Ohio which I represent, for funds under the Environmental Protection Agency Brownfields Assessment Grants program.

Xenia's HUB district has a long history of industrial use, as it is located along a former railroad and train depot. The nearby assets provide a strong base for redevelopment and job creation in the future. With the potential for environmental contamination in the area, the City's action plan seeks to address the Brownfields issues and challenges to revitalization and economic growth.

The City recognizes the importance of working with property owners and stakeholders on the remediation and redevelopment of Brownfield sites within the region. In addition it continues to dedicate substantial resources and leverage other sources of funding to implement its action plan to revitalize the community.

Thank you for considering Xenia as a recipient of this grant.

Sincerely,

Michael R. Turner
Member of Congress

Attachment v
Leveraged Fund Documentation

Leveraged Fund Documentation**IN-KIND SERVICES**

The below table summarizes the leveraged funds from in-kind services being committed to this grant application, the source of the funds, and the estimated value of the in-kind services.

Source	Resources Leveraged/Role of Resources	Estimated Value
City of Xenia	1) Meeting Rooms, educational materials, and staff needed for press releases, meetings/hearings, website updates, etc. to support community outreach efforts. 2) Staff to document site selection/ inventory process, community outreach efforts, program process, and oversee grant financial transactions to support programmatic activities 3) Site access support (access agreements, building access, etc.) to support PIESA, PIESA, and BUSTR activities. 4) Management of Assessment Grant in accordance with grant agreement to support programmatic activities.	\$25,000
Environmental Consultant	1) Develop Quality Assurance Project Plan 2) Assistance with community outreach services - website updates	\$5,000
Greene County Library	3) Assist with community outreach services. 4) Conduct additional research beyond work conducted for BAP to determine historical property uses.	\$10,000 (100 hrs @\$100/hr)
Friends Of Xenia Station (FOXS)	1) Volunteers to assist with communicating information to their membership and others. 2) Continue assisting the City with the maintenance of the trails in the Hub District.	\$1,000 (10 hrs @\$100/hr)
Greene County Parks & Trails	1) Staff to assist with communicating information to their membership as well as others. 2) Continue working with the City on the maintenance of the trails through the Hub District.	\$1,000 (10 hrs @\$100/hr)
Xenia Area Chamber of Commerce	1) Staff to assist with communicating information to their membership as well as others. 2) Provide meeting rooms for community outreach program	\$1,000 (10 hrs @\$100/hr)
Greene County Combined Health District	1) Provide health information for each of the 18 properties. 2) Assist in risk evaluation if requested. 3) Assist with community outreach services	\$10,000 (100 hrs @\$100/hr)
Partners for the Environment	1) Assist with community outreach services by providing the opportunity to speak at its regional meeting.	\$0
TOTAL		\$53,000

The commitment letters from the community-based organizations listed above are included in Attachment iv. It should be noted that the Greene County Public Library prepared a spreadsheet for the BAP which listed all of the 18 properties designated a priority to determine ownership and correct addresses as the City of Xenia has undergone a change in how properties in the HUB District were addressed over time. In addition, this spreadsheet identified whether the property was listed in various City Directories back to 1900. The Library estimated the value of this effort to be on the order of \$25,000¹.

FINANCIAL CONTRIBUTIONS

The City has already committed \$50,000 in funding from the Brownfield Action Plan grant for the purpose of funding the initial steps of a Phase II Environmental Assessment of a former manufactured gas plant.

¹ Verbal communication from the Head Librarian of the Greene County Public Library

Attachment vi
Requested Waiver Justification

No wavier is requested as this application is for a community-wide assessment; therefore, this attachment is not applicable.

Attachment vii
Property Specific Determination

No property-specific determination is requested as this application is for a community-wide assessment; therefore, this attachment is not applicable.

Attachment viii
Assessment Coalition Member Letters of Commitment

As this application is for a community-wide assessment, no coalition is proposed. Therefore, this attachment is not applicable.

Attachment ix
Petroleum Eligibility Determination

No petroleum eligibility determination is requested as this application is for a community-wide assessment; therefore, this attachment is not applicable.

Attachment x
Special Considerations Checklist

Appendix 3 Other Factors Checklist

Name of Applicant: City of Xenia, OH

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page#
<input type="checkbox"/>	Community population is 10,000 or less.	
<input type="checkbox"/>	Federally recognized Indian tribe.	
<input type="checkbox"/>	United States territory.	
<input type="checkbox"/>	Applicant will assist a Tribe or territory.	
<input type="checkbox"/>	Targeted brownfield sites are impacted by mine-scarred land.	
<input type="checkbox"/>	Targeted brownfield sites are contaminated with controlled substances.	
<input checked="" type="checkbox"/>	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress.	
<input type="checkbox"/>	Project is primarily focusing on Phase II assessments	
<input checked="" type="checkbox"/>	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation.	
<input type="checkbox"/>	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	
<input checked="" type="checkbox"/>	Recent (2008 or later) significant economic disruption (unrelated to a natural disaster or manufacturing/auto plant/power plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	

<input type="checkbox"/>	Applicant is one of the 12 recipients, or a core partner/implementation strategy party, of a “manufacturing community” designation provided by the Economic Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 12 recipients, or relevant pages from a recipient’s IMCP proposal which lists/describes the core partners and implementation strategy parties. A core partner/implementation strategy party is a local partner organization/jurisdiction that will carry out the proposed strategy, as demonstrated in letters of commitment or memoranda of understanding which documents their contributions, roles, and responsibilities to the partnership. EDA may provide to EPA a list of the core partners/implementation strategy parties for each of the 12 “manufacturing community” designees, which EPA would use to verify this other factor.	
<input type="checkbox"/>	Applicant will serve an area designated as a federal, state, or local Empowerment Zone or Renewal Community. To be considered, applicant must attach documentation which demonstrates this current designation.	
<input type="checkbox"/>	Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
<input type="checkbox"/>	Applicant is a HUD Promise Zone community. To be considered, applicant must attach documentation.	
<input type="checkbox"/>	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	

SUPPORT DOCUMENTATION SUMMARY FOR SPECIAL CONSIDERATIONS CHECKLIST**Natural Disaster Documentation**

FEMA declared a major disaster declaration (FEMA-3286-EM) of April 24, 2008 due to record snow fall during the period of March 7 through March 9, 2008 in Greene County. Most of the City and surrounding area required a number of days of snow removal prior the City was fully open to all residents.

FEMA declared a major disaster declaration (FEMA-1850-DR) of October 24, 2008 due to severe windstorm associated with Tropical Depression Ike on September 14, 2008 in Greene County. A number of structures in Xenia were damaged due to the high winds.

FEMA declared a major disaster declaration (FEMA-3346-EM) of June 30, 2012 due to severe storms including high winds and heavy rain during the period of June 29 through July 2, 2012 in Greene County. A number of structures in Xenia were damaged due to the high winds and very heavy rain fall. Some localized flooding occurred within the city limits.

Leveraging Commitments Documentation

See Attachment v demonstrating the following commitments of leveraged funding:

- \$53,000 committed for in-kind services
- \$25,000 of in-kind services already provided as part of the City's BAP effort
- \$50,000 in funding from the BAP grant to be used for the initial steps of a Phase II Environmental Assessment of a manufactured gas plant.

Significant Economic Disruption Documentation

The SuperValu Central Regional Office, Regional office, located on Bellbrook Road, in conjugation with their distribution center, was closed in May 2008, and consolidated into their Minnesota and Virginia regional offices. A total of 145 positions were lost ranging from regional management to marketing and distributing systems to administrative personnel.

In July 2010 Fulmer's Grocery Store, located in Towne Square Shopping Plaza (downtown), closed its doors resulting in the loss of 70 jobs. No grocery store has replaced this local store resulting in a food desert immediately adjacent to the Hub District.

May 2011: Brown Publishing, located on Cincinnati Avenue, consolidated all of their operations into their Miamisburg location resulting in the loss of 72 positions of which 60+ were for technical positions including printing machine operators and graphic artists.

By July 2012, the SuperValu distribution center was closed and its operations consolidated with the Richmond, IN warehouse. A total of 125 jobs were loss including management positions, logistics support teams, and warehouse fork lift operators.



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[Disaster Declaration](#)[Designated Counties](#)[Disaster Federal Register Notices](#)[FOIA Statistics](#)

Designated Counties: Ohio Severe Storms

[Ohio Severe Storms](#)*Incident period: Friday, June 29, 2012 to Monday, July 2, 2012*

Emergency Declaration declared on June 30, 2012

Individual Assistance

(Assistance to individuals and households)

None.

Public Assistance

(Assistance to State and local governments and certain private nonprofit organizations for emergency work and the repair or replacement of disaster damaged facilities)

PA

Ohio.

PA-B

Adams County, Allen County, Ashland County, Ashtabula County, Athens County, Auglaize County, Belmont County, Brown County, Butler County, Carroll County, Champaign County, Clark County, Clermont County, Clinton County, Columbiana County, Coshocton County, Crawford County, Cuyahoga County, Darke County, Defiance County, Delaware County, Erie County, Fairfield County, Fayette County, Franklin County, Fulton County, Gallia County, Geauga County, Greene County, Guernsey County, Hamilton County, Hancock County, Hardin County, Harrison County, Henry County, Highland County, Hocking County, Holmes County, Huron County, Jackson County, Jefferson County, Knox County, Lake County, Lawrence County, Licking County, Logan County, Lorain County, Lucas County, Madison County, Mahoning County, Marion County, Medina County, Meigs County, Mercer County, Miami

Assistance to State and local governments, Native American Tribes and certain Private-Non-Profit Organizations

Contact your [State or Tribal Emergency Management Office](#) to learn more about the [Public Assistance program](#).

Geographic Information

Google Earth



PDF of Map



FEMA Data Feeds

County, Monroe County, Montgomery County, Morgan County, Morrow County, Muskingum County, Noble County, Ohio, Ottawa County, Paulding County, Perry County, Pickaway County, Pike County, Portage County, Preble County, Putnam County, Richland County, Ross County, Sandusky County, Scioto County, Seneca County, Shelby County, Stark County, Summit County, Trumbull County, Tuscarawas County, Union County, Van Wert County, Vinton County, Warren County, Washington County, Wayne County, Williams County, Wood County and Wyandot County.

Hazard Mitigation Grant Program

(Assistance to State and local governments and certain private nonprofit organizations for actions taken to prevent or reduce long term risk to life and property from natural hazards)

Ohio.



FEMA Corps is a program that combines the expertise of FEMA and AmeriCorps to equip groups of young people to deploy into areas affected by disasters and assist the community with recovery. [Learn about the program and how you can get involved.](#)



Flat Stanley and Flat Stella are sharing emergency preparedness with children. [Read their blog posts](#), leave a comment, and suggest an upcoming adventure.

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U.S. Department of Homeland Security
500 C Street SW, Washington, DC 20472
General Operator: (202) 646-2500

Register for Disaster Assistance:
(800) 621-3362 / TTY (800) 462-7585



Ready ✓

DisasterAssistance.gov
ACCESS TO DISASTER HELP AND RESOURCES

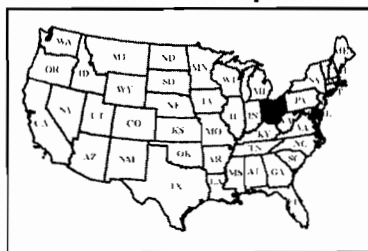


U.S. Fire Administration

FEMA-3346-EM, Ohio Disaster Declaration as of 06/30/2012



Location Map



Designated Counties

Public Assistance (Category B)



FEMA

MS-CI-AE-EG

All counties are eligible
for Hazard Mitigation

Mapping and Analysis Center
07/01/12 -- 3:57 AM EST

Source: Disaster Federal Registry Notice
00/00/0000

Ohio Severe Wind Storm associated with Tropical Depression Ike – FEMA-1805-DR

October 24, 2008

On October 14, 2008, Governor Ted Strickland requested a major disaster declaration due to a severe windstorm associated with Tropical Depression Ike on September 14, 2008. The Governor requested a declaration for Public Assistance for 33 counties and Hazard Mitigation for all counties. During the period of October 6-10, 2008, joint Federal, State, and local Preliminary Damage Assessments (PDAs) were conducted in the requested counties and are summarized below. PDAs estimate damage immediately after an event and are considered, along with several other factors, in determining whether a disaster is of such severity and magnitude that effective response is beyond the capabilities of the State and the affected local governments, and that Federal assistance is necessary.¹

On October 24, 2008, President Bush declared that a major disaster exists in the State of Ohio. This declaration made Public Assistance requested by the Governor available to State and eligible local governments and certain private nonprofit organizations on a cost-sharing basis for emergency work and the repair or replacement of facilities damaged by the severe windstorm associated with Tropical Depression Ike in Ashland, Brown, Butler, Carroll, Champaign, Clark, Clermont, Clinton, Coshocton, Delaware, Fairfield, Franklin, Greene, Guernsey, Hamilton, Harrison, Highland, Hocking, Holmes, Knox, Licking, Madison, Miami, Montgomery, Morrow, Perry, Pickaway, Preble, Shelby, Summit, Tuscarawas, Union, and Warren Counties. This declaration also made Hazard Mitigation Grant Program assistance requested by the Governor available for hazard mitigation measures statewide.²

Summary of Damage Assessment Information Used in Determining Whether to Declare a Major Disaster

Individual Assistance – (Not Requested)

- Total Number of Residences Impacted:³ N/A
 - Destroyed - -
 - Major Damage - -
 - Minor Damage - -
 - Affected - -
- Percentage of insured residences:⁴ -
- Percentage of low income households:⁵ -
- Percentage of elderly households:⁶ -
- Total Individual Assistance cost estimate: N/A

Public Assistance -

- Primary Impact: Costs associated with Debris Removal
- Total Public Assistance cost estimate: \$53,889,169
- Statewide per capita impact:⁷ \$4.75
- Statewide per capita impact indicator:⁸ \$1.31
- Countywide per capita impact: Ashland County (\$5.80),

Brown County (\$5.30), Butler County (\$14.37), Carroll County (\$15.02), Champaign County (\$6.35), Clark County (\$7.05), Clermont County (\$4.84), Clinton County (\$10.67), Coshocton County (\$13.55), Delaware County (\$7.72), Fairfield County (\$6.76), Franklin County (\$6.48), Greene County (\$14.83), Guernsey County (\$5.67), Hamilton County (\$16.07), Harrison County (\$8.68), Highland County (\$6.00), Hocking County (\$4.27), Holmes County (\$9.28), Knox County (\$13.93), Licking County (\$6.77), Madison County (\$10.04), Miami County (\$7.83), Montgomery County (\$15.01), Morrow County (\$8.88), Perry County (\$9.37), Pickaway County (\$6.44), Preble County (\$13.10), Shelby County (\$5.39), Summit County (\$3.28), Tuscarawas County (\$8.39), Union County (\$3.96), and Warren County (\$12.40) Counties

- Countywide per capita impact indicator:⁹ \$3.28

¹ The preliminary damage assessment (PDA) process is a mechanism used to determine the impact and magnitude of damage and resulting needs of individuals, businesses, public sector, and community as a whole. Information collected is used by the State as a basis for the Governor's request for a major disaster or emergency declaration, and by the President in determining a response to the Governor's request (44 CFR § 206.33).

² When a Governor's request for major disaster assistance under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Stafford Act) is under review, a number of primary factors are considered to determine whether assistance is warranted. These factors are outlined in FEMA's regulations (44 CFR § 206.48). The President has ultimate discretion and decision making authority to declare major disasters and emergencies under the Stafford Act (42 U.S.C. § 5170 and § 5191).

³ Degree of damage to impacted residences:

- Destroyed – total loss of structure, structure is not economically feasible to repair, or complete failure to major structural components (e.g., collapse of basement walls/foundation, walls or roof);
- Major Damage – substantial failure to structural elements of residence (e.g., walls, floors, foundation), or damage that will take more than 30 days to repair;
- Minor Damage – home is damaged and uninhabitable, but may be made habitable in short period of time with repairs; and
- Affected – some damage to the structure and contents, but still habitable.

⁴ By law, Federal disaster assistance cannot duplicate insurance coverage (44 CFR § 206.48(b)(5)).

⁵ Special populations, such as low-income, the elderly, or the unemployed may indicate a greater need for assistance (44 CFR § 206.48(b)(3)).

⁶ Ibid (44 CFR § 206.48(b)(3)).

⁷ Based on State population in the 2000 Census.

⁸ Statewide Per Capita Impact Indicator for FY09, *Federal Register*, October 1, 2008.

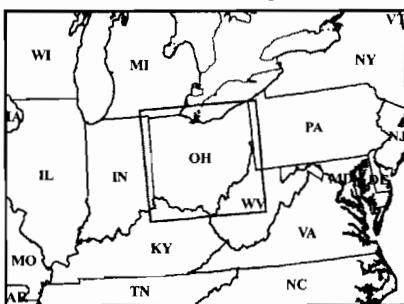
⁹ Countywide Per Capita Impact Indicator for FY09, *Federal Register*, October 1, 2008.

FEMA-1805-DR, Ohio

Disaster Declaration as of 10/24/2008



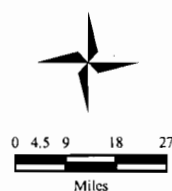
Location Map



Legend

Designated Counties

- ☐ No Designation
- ☐ Public Assistance



FEMA

ITS Mapping & Analysis Center
Washington, DC
10/24/08 -- 03:46 PM EDT

Source: Disaster Federal Registry Notice
10/24/2008

All counties are eligible
for Hazard Mitigation



FEMA



Home > Ohio Snow > Initial Notice

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Initial Notice

Date of Notice:

Thursday, April 24, 2008

Billing Code 9110-10-P

DEPARTMENT OF HOMELAND SECURITY

Federal Emergency Management Agency

[FEMA-3286-EM]

Ohio; Emergency and Related Determinations

AGENCY: Federal Emergency Management Agency, DHS.

ACTION: Notice.

SUMMARY: This is a notice of the Presidential declaration of an emergency for the State of Ohio (FEMA-3286-EM), dated April 24, 2008, and related determinations.

EFFECTIVE DATE: April 24, 2008.

FOR FURTHER INFORMATION CONTACT: Peggy Miller, Disaster Assistance Directorate, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, (202) 646-2705.

SUPPLEMENTARY INFORMATION: Notice is hereby given that, in a letter dated April 24, 2008, the President declared an emergency declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5206 (the Stafford Act), as follows:

I have determined that the impact in certain areas of the State of Ohio resulting from the record snow and near record snow during the period of March 7-9, 2008, is of sufficient severity and magnitude to warrant an emergency declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5206 (the Stafford Act). Therefore, I declare that such an emergency exists in the State of Ohio.

In order to provide Federal assistance, you are hereby authorized to allocate from funds available for these purposes such amounts as you

find necessary for Federal disaster assistance and administrative expenses.

You are authorized to provide emergency protective measures, including snow removal, under the Public Assistance program to save lives and to protect property and public health and safety. Other forms of assistance under Title V of the Stafford Act may be added at a later date, as you deem appropriate. This emergency assistance will be provided for any continuous 48-hour period during or proximate to the incident period. You may extend the period of assistance, as warranted. This assistance excludes regular time costs for the sub-grantees' regular employees. Consistent with the requirement that Federal assistance be supplemental, any Federal funds provided under the Stafford Act for Public Assistance will be limited to 75 percent of the total eligible costs in the designated areas. Further, you are authorized to make changes to this declaration to the extent allowable under the Stafford Act.

The Federal Emergency Management Agency (FEMA) hereby gives notice that pursuant to the authority vested in the Administrator, Department of Homeland Security, under Executive Order 12148, as amended, Michael H. Smith, of FEMA is appointed to act as the Federal Coordinating Officer for this declared emergency.

I do hereby determine the following areas of the State of Ohio to have been affected adversely by this declared emergency:

Ashtabula, Brown, Clermont, Clinton, Crawford, Delaware, Fairfield, Franklin, Geauga, Greene, Hardin, Huron, Lake, Morrow, Richland, Union, and Wyandot Counties for emergency protective measures (Category B), including snow removal, under the Public Assistance program for any continuous 48-hour period during or proximate to the incident period.

(The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund Program; 97.032, Crisis Counseling; 97.033, Disaster Legal Services Program; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance; 97.048, Individuals and Households Housing; 97.049, Individuals and Households Disaster Housing Operation...

3286

Last Updated: 07/17/2012 - 00:08

Federal Emergency Management Agency
U.S. Department of Homeland Security
500 C Street SW, Washington, DC 20472
General Operator: (202) 646-2500



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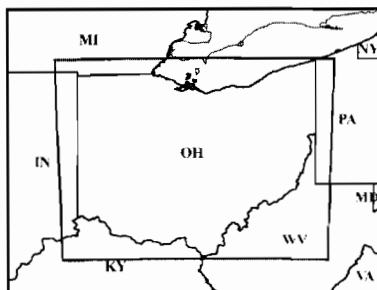
Register for Disaster Assistance:
(800) 621-3362 / TTY (800) 462-7585

FEMA-3286-EM, Ohio

Emergency Declaration as of 06/04/2008



Location Map



Legend

Designated Counties

	No Designation
	Public Assistance (Category B - Snow Removal)



FEMA

*ITS Mapping & Analysis Center
Washington, DC*

06/04/08 -- 10:00 AM EDT

*Source: Disaster Federal Registry Notice
Amendment No. 1 - 06/04/2008*

** For any continuous 48-hour period during or proximate to the incident period*